

Mr. Dennis Hamilton
Lear Corporation, Shenandoah Division
500 North Fillmore Road
Greencastle, IN 46135

Re: 133-11604
First Minor Permit Modification to
Part 70 No. 133-5083-00018

Dear Mr. Hamilton:

Lear Corp., Shenandoah Division was issued a permit on May 26, 1998, for manufacturing of injection molded plastic parts for use in automobile interiors. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document and as detailed below (bold emphasis added to new language):

1. Condition A.2 (Emission Units and Pollution Control Equipment Summary) on Page 6 of the permit and the facility description in Section D.3 on Page 35 of the permit shall be revised to include the following new equipment language:
 - (5) **Two (2) sliding door glue booths, identified as Glue Booths 17 and 19, equipped with air atomization spray applicators, with dry filters for overspray control, exhausting to stacks 17 and 19. Two (2) sliding door bolster wraps, identified as Sliding Door Bolster Wraps 18 and 20, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 18 and 20. Two (2) front door bolster wraps, identified as Front Door Bolster Wraps 21 and 22, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stack 21 and 22. The maximum capacity of each of the glue booths and the bolster wraps is 125 plastic automotive parts per hour.**
- Note: Page 7 of the permit shall be revised to make room on Page 6 for the new language.
2. The following new Item (c) shall be added to Condition D.3.1 (Best Available Control Technology (BACT) on Page 35 of the permit:
 - (c) **Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from Glue Booths 17 and 19 and Bolster Wraps 18 and 20 must be approved by the Office of Air Management (OAM) before such change may occur. The input VOC to the glue booths and bolster wraps is less than 25 tons per year, therefore, 326 IAC 8-1-6 (BACT) does not apply.**
3. Condition D.3.7 (Particulate Matter) on Page 36 of the permit shall be modified to require operation of the particulate matter controls for the new facilities as follows:

D.3.7 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when Glue Booths 7A, ~~and~~ 8A, **17 and 19**, Bolster Wraps 7B, ~~and~~ 8B, **18, 20, 21 and 22** and the Paint at Press Booth are in operation.

4. Item (a) of Condition D.3.8 (Monitoring) on Page 36 of the permit shall be revised to incorporate the applicable compliance monitoring requirements for the new facilities as follows:

D.3.8 (a) Daily inspections shall be performed at Glue Booths 7A, ~~and~~ 8A, **17 and 19**, Bolster Wraps 7B, ~~and~~ 8B, **18, 20, 21 and 22** and the Paint at Press Booth to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janusz Johnson, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension 2-8325, or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments: Revised Part 70 pages (5 pages)
JKJ

cc: File - Putnam County
U.S. EPA, Region V
Putnam County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Lear Corporation, Shenandoah Division
500 North Fillmore Road
Greencastle, IN 46135**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T133-5083-00018	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: May 26, 1998

First Significant Permit Modification No. 133-11265-00018 (Review pending)

First Minor Permit Modification: 133-11604	Pages Affected: 6, 7, 35 and 36
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary plant for the manufacture of injection molded plastic parts for use in automobile interiors.

Responsible Official: Dennis Hamilton, General Manager
Source Address: 500 North Fillmore Road. Greencastle, Indiana 46135
Mailing Address: 500 North Fillmore Road. Greencastle, Indiana 46135
SIC Code: 3089
County Location: Putnam
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One S-Van paint application line, identified as Paint Line 1 consisting of two (2) paint booths, 1 and 2, and one (1) curing oven, with a maximum capacity of 420 plastic parts per hour, with particulate matter overspray from each booth controlled by water curtain, and exhausting to stacks 1, 2, and 5.
- (2) Six (6) glue booths, identified as Glue Booth 9A, 9B, 10A, 10B, 11 and 12, each with a maximum capacity of 125 plastic and fabric parts per hour, and exhausting to stacks 9, 10, 11 and 12. Glue Booths 11 and 12 use dry filters for particulate matter overspray control.
- (3) One (1) paint at press booth, identified as PPB, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.
- (4) Two (2) glue booths, identified as Glue Booths 7A and 8A, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively, and two (2) bolster wrap machines, identified as Bolster Wraps 7B and 7B2, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively. The combined maximum capacity of these units is 288 plastic automotive parts per hour.
- (5) Two (2) sliding door glue booths, identified as Glue Booths 17 and 19, equipped with air atomization spray applicators, with dry filters for overspray control, exhausting to stacks 17 and 19. Two (2) sliding door bolster wraps, identified as Sliding Door Bolster Wraps 18 and 20, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 18 and 20. Two (2) front door bolster wraps, identified as Front Door Bolster Wraps 21 and 22, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stack 21 and 22. The maximum capacity of each of the glue booths and the bolster wraps is 125 plastic automotive parts per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (water boiler - 0.78 MMBtu/hr, water boiler - 1.092 MMBtu/hr, comfort heat boiler - 0.745 MMBtu/hr, space heaters).
- (2) Other categories with emissions below insignificant thresholds:
 - (a) Touch-up paint booth 1 in "S-Van" paint room;
 - (b) Touch-up paint booth 2 in "S-Van" paint room;
 - (c) Mask washer in "S-Van" paint room;

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION D.3

FACILITY OPERATION CONDITIONS

- (3) One (1) paint at press booth, identified as PPB, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.
- (4) Two (2) glue booths, identified as Glue Booths 7A and 8A, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively, and two (2) bolster wrap machines, identified as Bolster Wraps 7B and 7B2, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively. The combined maximum capacity of these units is 288 plastic automotive parts per hour.
- (5) Two (2) sliding door glue booths, identified as Glue Booths 17 and 19, equipped with air atomization spray applicators, with dry filters for overspray control, exhausting to stacks 17 and 19. Two (2) sliding door bolster wraps, identified as Sliding Door Bolster Wraps 18 and 20, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 18 and 20. Two (2) front door bolster wraps, identified as Front Door Bolster Wraps 21 and 22, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stack 21 and 22. The maximum capacity of each of the glue booths and the bolster wraps is 125 plastic automotive parts per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

- (a) Pursuant to CP 133-8476-00018, issued on September 11, 1997, the VOC content of the glue supplied to the applicators of Glue Booths 7A and 8A and Bolster Wraps 7B and 7B2 shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) not applicable to these facilities.
- (b) Pursuant to CP 133-8476-00018, issued on September 11, 1997, the VOC content delivered to the applicators of the Paint at Press Booth shall not exceed 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) not applicable to these facilities.
- (c) Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from Glue Booths 17 and 19 and Bolster Wraps 18 and 20 must be approved by the Office of Air Management (OAM) before such change may occur. The input VOC to the glue booths and bolster wraps is less than 25 tons per year, therefore, 326 IAC 8-1-6 (BACT) does not apply.

D.3.2 PSD Minor Source Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC content delivered to the applicator of Glue Booths 7A and 8A, Bolster Wraps 7B and 7B2 and the Paint at Press Booth, shall be such that VOC emissions from these combined facilities shall not exceed 3.25 tons per month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Paint Line 2, and all the glue booths and bolster wraps booths (in the section D.3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-7-6(1)]

If testing is required, compliance with the VOC limits specified in Condition D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when Glue Booths 7A, 8A, 17 and 19, Bolster Wraps 7B, 8B, 18, 20, 21 and 22 and the Paint at Press Booth are in operation.

D.3.8 Monitoring

- (a) Daily inspections shall be performed at Glue Booths 7A, 8A, 17 and 19, Bolster Wraps 7B, 8B, 18, 20, 21 and 22 and the Paint at Press Booth to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plans.

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Minor Permit Modification
to a Part 70 Operating Permit**

Source Background and Description

Source Name:	Lear Corporation, Shenandoah Division
Source Location:	500 N Fillmore Rd., Greencastle, Indiana 46135
County:	Putnam
SIC Code:	3089
Operation Permit No.:	T 133-5083-00018
Operation Permit Issuance Date:	May 26, 1998
Minor Permit Modification No.:	133-11604-00018
Permit Reviewer:	Janusz Johnson

The Office of Air Management (OAM) issued a minor source modification to Lear Corporation, Shenandoah Division relating to the construction of the following emission units and pollution control devices on August 10, 1999 (Source Modification No. 133-11168-00018):

- (a) Two (2) sliding door glue booths, identified as Glue Booths 17 and 19, equipped with air atomization spray applicators, with dry filters for overspray control, exhausting to stacks 17 and 19. Two (2) sliding door bolster wraps, identified as Sliding Door Bolster Wraps 18 and 20, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 18 and 20. Two (2) front door bolster wraps, identified as Front Door Bolster Wraps 21 and 22, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stack 21 and 22. The maximum capacity of each of the glue booths and the bolster wraps is 125 plastic automotive parts per hour.

This minor permit modification is intended to fulfill the requirements of 326 IAC 2-10.5(e)(3) and 326 IAC 2-12 by incorporating the emission units which have received preconstruction approval into the source's Part 70 permit.

History

Lear Corporation, Shenandoah Division was issued a Part 70 permit on May 26, 1998. On July 21, 1999, Lear Corporation, Shenandoah Division submitted an application to the OAM requesting to add additional glue and bolster wrap booths to their existing plant. A Minor Source Modification (133-11168-00018) was issued on August 10, 1999, for these new emission units. At the time Lear Corporation submitted the application for this modification, a request was made that operation of the new emission units would commence in accordance with 326 IAC 2-12 (Permit Modification).

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 21, 1999.

Justification for Modification

The Part 70 Operating permit is being revised through a Minor Permit Modification. This revision is being performed pursuant to 326 IAC 2-7-10.5(e)(3) and 326 IAC 2-12(b).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The glue booths 17 and 19, bolster wrap booths 18, 20, 21 and 22 have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
 - (b) Weekly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary ensure compliance with 326 IAC 6-3-2 (Process Operations).

Conclusion

The operation of the additional glue and bolster wrap booths shall be subject to the conditions of the attached proposed **Minor Permit Modification No. 133-11604-00018**.